

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

| | | |
|-----------------|---|-------------------------------------|
| EVALINA SMALLS, |) | Civil Action No. 2:13-cv-00796-RMG |
| |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | JOINT MOTION FOR ENTRY OF |
| |) | <u>CONFIDENTIALITY ORDER</u> |
| PFIZER INC., |) | |
| |) | |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |

| | | |
|---------------------|---|------------------------------------|
| WALTRAUD GINA KANE, |) | Civil Action No. 2:13-cv-01012-RMG |
| |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| PFIZER INC., |) | |
| |) | |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |

| | | |
|---------------------|---|------------------------------------|
| SUSAN MARIE TURNER, |) | Civil Action No. 2:13-cv-01108-RMG |
| |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| PFIZER INC., |) | |
| |) | |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |

| | | |
|--------------------|---|------------------------------------|
| MARGARET A. CLARK, |) | Civil Action No. 2:13-cv-01164-RMG |
| |) | |
| |) | |
| Plaintiff, |) | |
| |) | |
| vs. |) | |
| |) | |
| PFIZER INC., |) | |
| |) | |
| |) | |
| Defendant. |) | |
| |) | |
| |) | |

BONNIE C. KNIGHT,) Civil Action No. 0:13-cv-01375-RMG
) (Columbia Division)

Plaintiff,)

vs.)

PFIZER INC.,)

Defendant.)

BRENDA K. WILLIAMS,) Civil Action No. 8:13-cv-01421-RMG
) (Anderson Division)

Plaintiff,)

vs.)

PFIZER INC.,)

Defendant.)

PATRICIA FERNANDEZ,) Civil Action No. 4:13-cv-01423-RMG
) (Florence Division)

Plaintiff,)

vs.)

PFIZER INC.,)

Defendant.)

CHRISTINE PAPCUN,) Civil Action No. 4:13-cv-01422-RMG
) (Florence Division)

Plaintiff,)

vs.)

PFIZER INC.,)

Defendant.)

CONSENT:

The attached proposed Confidentiality Order is requested:

X by consent of all parties.

- ☐ by consent as to some, but not all, of the terms [alternative provisions are set forth in both proposed and redlined versions].
- ☐ by some, but not all, parties [requesting parties include: [requesting parties]].

CONTENT:

The attached proposed Confidentiality Order:

- ☐ is identical to the standard form on the court's website.
- ☐ has been revised by deleting the Reading Room provision, but no other changes have been made (*redlined copy not required*).
- ☒ is a modified version of the standard form on the court's website and the modifications have been indicated by attaching a "redlined" copy the document. An explanation of the basis for each proposed modification is as follows:

Paragraph 3: This paragraph has been amended to provide that an attorney's good faith designation of a document as confidential shall be sufficient.

Paragraph 4: This paragraph has been amended to address the Parties' concern that adequate time be allotted to enable the designation of depositions as Confidential.

Paragraphs 5.b and 5.c.: These paragraphs have been amended to identify additional categories of persons who may be allowed to review confidential information in these actions and to identify the circumstances under which confidential information may be shown to a deponent or witness.

Paragraph 5.d.: This paragraph has been added to prohibit disclosure of confidential information to a producing Defendant's competitor absent certain notice.

Paragraph 5.f.: This paragraph has been added to address the security risks associated with the storage and transmission of electronic data.

Paragraph 8: This paragraph has been amended to set forth an agreed process for providing notice of, conferring as to, and making any necessary motions regarding challenges to confidentiality designations.

Paragraphs 9 and 10: These paragraphs have been added to set forth agreed processes for the treatment of inadvertently produced confidential or privileged information.

WE SO MOVE/CONSENT

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July 2, 2013

WE SO MOVE/CONSENT

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July 2, 2013